

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHAREÉ CAREY,

Plaintiff,

-against-

NEW YORK STATE DEPARTMENT OF
HEALTH, et al.

Defendants.

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No. 23-cv-3061 (LGS)

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RULE 502(d)

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~~PROPOSED~~ ORDER

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X


1. The production of privileged or work-product protected documents, electronically stored information (“ESI”) or other information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence § 502(d).

2. Nothing contained herein is intended to or shall serve to limit a party’s right to conduct a review of documents, ESI or information for relevance, responsiveness and/or exclusion of privileged and/or protected information before production.

So Ordered.

Dated: January 4, 2024

New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE